

**FILED**

NOV 13 2012

Board of Vocational Nursing  
and Psychiatric Technicians

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**BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2009-3969

**TARJOT KAUR  
2360 Riverrock Drive  
Merced, CA 95340**

**A C C U S A T I O N**

**Vocational Nurse License No. VN 244228**

Respondent.

Complainant alleges:

**PARTIES**

1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians ("Board"), Department of Consumer Affairs.

**Vocational Nurse License**

2. On or about August 24, 2009, the Board issued Vocational Nurse License Number VN 244228 to Tarjot Kaur ("Respondent"). The vocational nurse license was in full force and effect at all times relevant to the charges brought herein and will expire on December 31, 2012, unless renewed.

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**JURISDICTION**

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

**STATUTORY PROVISIONS**

4. Code section 2875 provides, in pertinent part, that the Board may discipline the holder of a vocational nurse license for any reason provided in Article 3 (commencing with section 2875) of the Vocational Nursing Practice Act.

5. Code section 118, subdivision (b) provides, in pertinent part, that the expiration of a license shall not deprive the Board jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under Code section 2892.1, the Board may renew an expired license at any time within four years after the expiration.

6. Code section 2878 states, in pertinent part:

The Board may suspend or revoke a license issued under this chapter [the Vocational Nursing Practice Act (Bus. & Prof. Code, 2840, et seq.)] for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) The use of excessive force upon or the mistreatment or abuse of any patient. For the purposes of this paragraph, 'excessive force' means force clearly in excess of that which would normally be applied in similar clinical circumstances.

(j) The commission of any act involving dishonesty, when that action is related to the duties and functions of the licensee.

**COST RECOVERY**

7. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Mistreatment of Residents)**

3 8. Respondent has subjected her license to discipline pursuant to Code section 2878,  
4 subdivision (a)(4), on the grounds of unprofessional conduct, in that on or about March 30, 2010,  
5 while on duty as a licensed vocational nurse at the Dos Palos Memorial Skilled Nursing, Dos  
6 Palos, California, Respondent mistreated Patients A, B, and C, by failing to administer G-Tube  
7 feedings to these patients, as prescribed by the patients' physicians.

8 **SECOND CAUSE FOR DISCIPLINE**

9 **(Acts Involving Dishonesty)**

10 9. Respondent has subjected her license to discipline pursuant to Code section 2878,  
11 subdivision (j), that on or about March 30, 2010, by her own admission, Respondent committed  
12 acts involving dishonesty by initialing the patient charts for Patients A, B, and C to show she had  
13 administered G-Tube feedings to these patient when, in fact, she had not.

14 **PRAYER**

15 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
16 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians  
17 issue a decision:

18 1. Revoking or suspending Vocational Nurse License Number VN 244228, issued, to  
19 Tarjot Kaur;

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2. Ordering Tarjot Kaur to pay the Board of Vocational Nursing and Psychiatric Technicians the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

3. Taking such other and further action as deemed necessary and proper.

NOV 13 2012  
DATED: \_\_\_\_\_

TERESA BELLO-JONES, J.D., M.S.N., R.N.  
Executive Officer  
Board of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
*Complainant*